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February 12, 2021

BY ELECTRONIC FILING

Hon. Lewis A. Kaplan  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: Anthony Rapp and C.D. v. Kevin Spacey Fowler a/k/a Kevin Spacey  
Southern District of New York, Case No. 1:20-cv-09586 (LAK)

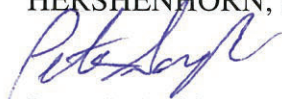
Dear Judge Kaplan:

As Your Honor is aware, we represent the plaintiffs, including C.D., in the above-referenced matter.

We write in opposition to defendant Spacey's letter motion dated February 12, 2021, seeking to strike the Declaration of Seymour H. Block, D.O. ("Declaration"). We respectfully submit that the submission of the Declaration is appropriate under the circumstances. The Declaration did not add any new facts or arguments but was directly responsive to the argument made by defendant Spacey that the Declaration of Neil Bonavita, a licensed clinical social worker, should be disregarded because he is not a medical doctor. Dr. Block, a medical doctor, concurs with the findings set forth in Mr. Bonavita's declaration and similarly opines that if C.D. is required to publicly disclose his name in the litigation he will suffer substantial psychological harm.

Accordingly, we respectfully request this Court consider the Declaration of Seymour H. Block, D.O., in further support of C.D.'s motion to proceed by pseudonym.

Respectfully submitted,  
GAIR, GAIR, CONASON, RUBINOWITZ, BLOOM,  
HERSHENHORN, STEIGMAN & MACKAUF

  
Peter J. Saghir